

1 MATTHEW J. JACOBS (CSBN 171149)  
2 [mjacobs@mwe.com](mailto:mjacobs@mwe.com)  
3 KATHERINE C. KIM (SBN 240951)  
4 [kkim@mwe.com](mailto:kkim@mwe.com)  
5 McDERMOTT WILL & EMERY LLP  
6 3150 Porter Drive  
7 Palo Alto, CA 94304-1212  
Telephone: 650.813.5000  
Facsimile: 650.813.5100

6 Attorneys for Defendant  
7 FARREL J. LECOMPTE, JR.

8 SCOTT N. SCHOOLS  
9 United States Attorney  
DAVID HALL  
10 Assistant United States Attorney  
Phillip Burton Federal Building  
11 450 Golden Gate Avenue, BOX 36055  
San Francisco, CA 94102  
Telephone: 415.436.7200  
Facsimile: 415.436.7234

13 Attorneys for Plaintiffs  
14 UNITED STATES OF AMERICA

15 UNITED STATES DISTRICT COURT  
16 NORTHERN DISTRICT OF CALIFORNIA

18 UNITED STATES OF AMERICA,  
19 Plaintiff,  
20 v.  
21 FARREL J. LECOMPTE, JR.  
22 Defendants.

CASE NO. 3:05-cr-00611-WHA

**STIPULATION TO PERMIT  
LECOMPTE, JR. TO TRAVEL FROM  
AUGUST 31 TO SEPTEMBER 3, 2007 AND  
SEPTEMBER 20 TO SEPTEMBER 23, 2007**

23 Now come Plaintiff United States of America and Defendant Farrel J. LeCompte, Jr.,  
24 through their respective attorneys of record and subject to the approval of this Court, to stipulate  
25 that LeCompte be permitted to travel outside of the jurisdictions specified in the conditions of his  
26 pre-trial release in the months of August and September 2007.  
27

1           On February 24, 2006, the Hon. Stephen Smith, United States Magistrate Judge for the  
 2 United States District Court in the Southern District of Texas, ordered, as part of the conditions  
 3 for LeCompte's release from custody, that LeCompte limit his travel to the jurisdictions of the  
 4 Southern District of Texas and the Northern District of California, Oakland Division.  
 5

6           Since the execution of the bond, LeCompte has complied with all pretrial conditions and  
 7 has traveled from Houston, Texas to San Francisco, California to make over six court  
 8 appearances in Case No. CR 05-006611 WHA. On August 16, 2006, Hon. Joseph C. Spero  
 9 signed an order granting a stipulation of the parties to reduce the cash deposit on LeCompte's  
 10 bond from \$25,000 to \$10,000.

11          On September 6, 2006, LeCompte pled guilty to one count of conspiracy in violation of 18  
 12 U.S.C. § 371. LeCompte's original sentencing date of March 20, 2007 has been continued to  
 13 December 4, 2007 at both parties' request as a result of the trial date for the remaining defendants  
 14 in this matter being set to October 15, 2007.

15          LeCompte has previously traveled outside the jurisdictions specified in his pre-trial  
 16 release conditions without incident, on each occasion obtaining the prior permission of the  
 17 Plaintiff United States of America and the Court.

18          LeCompte seeks permission to make two short trips, one in August 2007 and the other in  
 19 September 2007. First, LeCompte seeks permission to travel to the Eastern District of Louisiana,  
 20 specifically New Orleans, over Labor Day weekend, from August 31, 2007 to September 3, 2007.  
 21 LeCompte will be staying with his parents, who reside in New Orleans.

22          LeCompte also seeks permission to travel to the Southern District of Florida, specifically  
 23 Miami, from September 20 to September 23, 2007.

24          The parties respectfully request that this Court order that LeCompte be granted approval  
 25 to travel to New Orleans, Louisiana in August 2007 and to Miami, Florida in September 2007.  
 26

1  
2 Dated: August 30, 2007

/s/

3 Katherine C. Kim  
4 Attorneys for Defendant  
Farrel J. LeCompte, Jr.

5  
6 Dated: August 31, 2007

/s/

7 David Hall  
8 Assistant United States Attorney  
9 Attorneys for Plaintiff  
United States of America

10  
11 IT IS SO ORDERED:

12  
13 Dated: August 31, 2007

